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Attorneys for Defendants
KAL FREIGHT INC., SPG TRANSPORTATION INC.,
and PRO TEC INC.

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF RIVERSIDE

JANE DOE, individually, on a representative
basis, and on behalf of all others similarly
situated;

Plaintiff,

vs.

KAL FREIGHT, INC., a Texas Corporation;
SPG TRANSPORTATION INC., a California
Corporation; PRO TEC INC., a California
Corporation; and DOES 1 through 20,
inclusive;

Defendants.

Case No.: CVRI2204960

[Assigned for all purposes to:
Judge: Hon. Harold W. Hopp, Dept. 1]

**DECLARATION OF DEFENDANTS'
COUNSEL, NICOLE M. SHAFFER, IN
SUPPORT OF PLAINTIFFS' UNOPPOSED
MOTION FOR PRELIMINARY APPROVAL
OF CLASS ACTION AND PAGA
SETTLEMENT**

Hearing

Date: December 4, 2024

Time: 8:30 a.m.

Dept.: 1

Complaint filed: November 14, 2022

Trial Date: None Set

DECLARATION OF NICOLE M. SHAFFER

I, Nicole M. Shaffer, declare and state as follows:

1. I am an attorney admitted to practice in the State of California. I am an attorney with the law firm Jackson Lewis P.C., counsel of record for Defendants KAL Freight, Inc., SPG Transportation Inc., and Pro Tec Inc. (collectively, "Defendants"). The following is based on my personal knowledge,

1 and my knowledge based on my review of and familiarity with the files and the documents in the above-
2 captioned matter. If called as a witness, I could and would competently testify to the facts contained
3 herein.

4 2. I make this Declaration in support of the Motion For Preliminary Approval Of Class Action
5 And PAGA Settlement in the pending matter of *Jane Doe v. KAL Freight, Inc., et al.*, Riverside County
6 Superior Court Case No. CVRI2204960, and to comply with paragraph G(3)(b) of the current Case
7 Management Order (“CMO”) governing this case.

8 3. **CMO Section G(3)(b)**: I am the lead attorney for Defendants in this action. Neither I nor
9 my clients are aware of any class, representative or other collective action in any other court in this or any
10 other jurisdiction that asserts claims similar to those asserted in this action on behalf of a class or group
11 of individuals some or all of whom would also be members of the class defined in this action.

12 Prior to mediation, my office conducted research to compile all employment lawsuits filed against
13 Defendants from November 14, 2018 to the present, the search did not produce results which would lead
14 me to believe that there are claims similar to those asserted in this action on behalf of a class or group of
15 individuals some or all of whom would also be members of the class defined in this action.

16 I declare under penalty of perjury under the laws of the State of California that the foregoing is
17 true and correct.

18 Executed this 4th day of November 2024, at Riverside, California.

19
20 

21 _____
Nicole M. Shaffer